

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	CRIM. NO. 04-300 -33-MAP
)	
vs.)	
)	
1. RAYMOND ASSELIN, SR.,)	
2. ARTHUR SOTIRION,)	
3. PETER DAVIS,)	
4. JOHN SPANO,)	
5. PAUL BANNICK,)	
6. JANET ASSELIN,)	
7. JAMES ASSELIN,)	
8. RAYMOND ASSELIN, JR.)	
9. JOSEPH ASSELIN,)	
10. MELINDA ASSELIN,)	
11. MARIA SERRAZINA,)	
12. CHRISTOPHER ASSELIN, and)	
13. MERYLINA ASSELIN,)	
Defendants.)	

ASSENTED-TO MOTION FOR EXTENSION OF TIME

Defendants Raymond Asselin, Sr., Arthur Sotirion, Peter Davis, John Spano, Paul Bannick, Janet Asselin, James Asselin, Raymond Asselin, Jr., Joseph Asselin, Melinda Asselin, Maria Serrazina, Christopher Asselin, and Merylina Asselin respectfully request an extension of time of 60 days for certain deadlines set forth in the various scheduling orders in this case. In support, they state as follows:

1. On July 13, 2004, this Court issued two Scheduling Orders and on July 15, 2004, a third. Although each order concerned different defendants, the deadlines affected by this Motion for Extension of Time are identical.
2. The current deadlines for which the Defendants seek an extension are:
 - a. discovery letters (under the current Orders, to be filed by August 26, 2004);

- b. responses to discovery letters (under the current Orders, to be filed within 14 days of Defendants' discovery letters or by September 9, 2004, whichever date occurs first);
- c. discovery motions (under the current Orders, to be filed within 14 days of the opposing party's declination to provide discovery or failure to respond, whichever date occurs first);
- d. Initial Status Conference (under the current Orders, to be held on September 8, 2004); and
- e. Joint memorandum under Local Rule 116.5(A)(1) through (7) (under the current Orders, to be filed by September 3, 2004).

3. The Defendants respectfully request a 60 day extension of time for each deadline set forth above.

4. Good cause exists for the Defendants' Motion because of the complexity of the charges against them. Also, discovery is expected to be voluminous and extraordinarily time consuming. Given these factors, and in order to effectively represent their respective clients, counsel for the Defendants require substantial time to review the automatic discovery provided to date and to formulate requests for additional discovery.

5. Assistant United States Attorney William Welch assents to this Motion for Extension of Time.

WHEREFORE, Defendants Raymond Asselin, Sr., Arthur Sotirion, Peter Davis, John Spano, Paul Bannick, Janet Asselin, James Asselin, Raymond Asselin, Jr., Joseph Asselin, Melinda Asselin, Maria Serrazina, Christopher Asselin, and Merylina

Asselin respectfully request that this Court grant this Motion and impose the following Scheduling Order:

- a. Discovery letters to be filed by **October 26, 2004**;
- b. Responses to discovery letters to be filed within 14 days of Defendants' discovery letters, or **November 9, 2004**, whichever date occurs first;
- c. Discovery motions to be filed within 14 days of the opposing party's declination to provide discovery or failure to respond, or **November 23, 2004**, whichever date occurs first;
- d. Initial Status Conference to be held on **November 9, 2004** (if that date is convenient for the Court); and
- e. The parties' joint memorandum under Local Rule 116.5(A)(1) through (7) to be filed by **November 2, 2004**.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Patricia A. DeJuneas, do hereby certify that I have served the foregoing Notice of Appearance on all defense counsel of record as well as William Welch, AUSA, by first class mail, this 26th day of August, 2004

/s/ Patricia A. DeJuneas

Patricia A. DeJuneas